

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jeff Stark and Nick Nowak as Trustees of
the District Council No. 82 Health Care
Fund, et al,

Case No.: 24-cv-01762 (JWB/DJF)

Plaintiffs,

vs.

**DECLARATION OF
CHRISTY E. LAWRIE**

K&C Specialties Corp., and James Isaac
Spinks, individually,

Defendants.

CHRISTY E. LAWRIE, acknowledging that this document is signed under the penalty of perjury, states as follows:

1. I am one of the attorneys of record for the Plaintiffs in this action. I have personal knowledge of the facts set forth herein.
2. More than 10 days have passed since K&C Specialties Corp. ("K&C Specialties") and James Isaac Spinks ("Spinks") were served with the January 28, 2025 Order, and to date, K&C Specialties and Spinks have failed to provide any of the Ordered records.
3. At no time have K&C Specialties or Spinks alleged an inability to comply with the Order.
4. Production of the payroll and employment reports is essential, and K&C Specialties and Spinks failure and refusal to comply with this Court's Order has adversely affected the Plaintiffs.

5. Plaintiffs reasonably believe that Spinks has custody and control over the documents specified in the Order.

6. Given that K&C Specialties and Spinks have failed to simply provide the Plaintiffs payroll and employment reports, the assessment of a civil fine is unlikely to coerce compliance with the Order.

7. This Declaration is made in support of Plaintiffs' Motion for an Order to Show Cause.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

/s/ Christy E. Lawrie
Christy E. Lawrie